

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Doris B. v. Frank Bisignano, Commissioner of Social Security

Doris B. v. Bisignano, No. 2:23-cv-03990, slip op. (D.N.J. Jan. 9, 2026) · No. 2:23-cv-03990 · Decided January 9, 2026

SUMMARY

The United States District Court for the District of New Jersey reviews the Commissioner of Social Security’s denial of Doris B.’s applications for Disability Insurance Benefits and Supplemental Security Income. The court holds that the administrative law judge’s residual functional capacity determination and denial of benefits are supported by substantial evidence and affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Norah McCann King
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 9, 2026
DOCKET	2:23-cv-03990
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's denial of applications for Disability Insurance Benefits and Supplemental Security Income. Following an earlier remand by the district court, the ALJ again found Plaintiff not disabled. The court affirmed the Commissioner's decision.
STANDARD OF REVIEW	The court conducts plenary review of legal issues and reviews the ALJ's factual findings for substantial evidence. The court may not reweigh evidence or substitute its judgment for that of the ALJ, but must review the record as a whole, account for evidence detracting from the ALJ's conclusion, and ensure that the ALJ sufficiently explains the findings to permit meaningful judicial review.
PRECEDENTIAL VALUE	Unknown; district court opinion with no reported citation identified
PARTIES	Doris B. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

ada / disability

PRACTICE AREAS

Social Security

administrative law

disability benefits

federal judicial review

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's residual functional capacity assessment.
2. Whether the ALJ adequately considered Plaintiff's physical impairments, including bilateral carpal tunnel syndrome, and reasonably limited her to frequent handling, fingering, and feeling.
3. Whether the ALJ adequately accommodated Plaintiff's moderate mental-functioning limitations by limiting her to simple instructions and occasional workplace interaction.
4. Whether the ALJ was required to include alleged off-task time and unscheduled breaks in the RFC or vocational hypothetical.

HOLDINGS

1. The ALJ's RFC determination was supported by substantial evidence because the decision discussed the relevant medical and other evidence, addressed Plaintiff's physical and mental limitations, and explained the resulting exertional and nonexertional restrictions.
2. The ALJ was not required to use a particular function-by-function format and reasonably accounted for Plaintiff's carpal tunnel syndrome by limiting her to frequent, rather than constant, handling, fingering, and feeling.
3. The limitation to understanding, remembering, and carrying out simple instructions, together with occasional interaction with supervisors, coworkers, and the public, adequately addressed the supported mental limitations.
4. The ALJ was not required to include off-task time or unscheduled breaks that were not credibly established by the record.

KEY QUOTATIONS

"Under the substantial-evidence standard, a court looks to an existing administrative record and asks whether it contains sufficien[t] evidence to support the agency's factual determinations." (3)

*"Although an ALJ's RFC assessment 'must first identify the individual's functional limitations or restrictions and assess his or her work-related abilities on a function-by-function basis[.]" SSR 96-8p, 1996 WL 374184, at *1 (July 2, 1996), an ALJ is not required "to use particular language or adhere to a particular format in conducting [that] analysis[;]" instead, the ALJ's decision must contain "sufficient development of the record and explanation of findings to permit meaningful review."'" (13-14)*

"In short, for all these reasons, the Court concludes that the ALJ's findings regarding Plaintiff's physical and mental RFC are consistent with the record evidence and enjoy substantial support in the record." (19)

FACTUAL BACKGROUND

Plaintiff alleged disability based on physical and mental impairments including lumbar radiculopathy, obesity, bilateral carpal tunnel syndrome, major depressive disorder, and panic disorder with agoraphobia. The record included generally unremarkable or mildly abnormal physical examinations, some wrist pain and restricted range of motion, and mental-health evidence showing ongoing symptoms but improvement with medication and therapy. The ALJ found that Plaintiff could perform a limited range of light work with postural, manipulative, environmental, and mental restrictions, but could not perform her past relevant work. Based on vocational-expert testimony, the ALJ found that Plaintiff could perform other jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff filed applications for Disability Insurance Benefits and Supplemental Security Income in 2016, alleging disability beginning January 15, 2013. The applications were denied initially and on reconsideration, and an ALJ denied benefits in 2019. The district court reversed and remanded for clarification of exertional limitations and reassessment of the combined effect of Plaintiff's impairments. After a second hearing, a new ALJ again found Plaintiff not disabled, and Plaintiff appealed. The court affirmed, concluding that the ALJ's RFC and disability findings were supported by substantial evidence.

DISPOSITION

affirmed

CASES CITED

- Knepp v. Apfel, 204 F.3d 78, 83 (3d Cir. 2000)
- Sykes v. Apfel, 228 F.3d 259, 262 (3d Cir. 2000)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Fargnoli v. Massanari, 247 F.3d 34, 38 (3d Cir. 2001)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- Hunter Douglas, Inc. v. NLRB, 804 F.2d 808, 812 (3d Cir. 1986)
- Kent v. Schweiker, 710 F.2d 110, 114 (3d Cir. 1983)
- Cotter v. Harris, 642 F.2d 700, 706 (3d Cir. 1981)
- Wallace v. Secretary of Health & Human Services, 722 F.2d 1150, 1153 (3d Cir. 1983)
- Jones v. Barnhart, 364 F.3d 501, 505 (3d Cir. 2004)
- Burnett v. Commissioner of Social Security, 220 F.3d 112, 119-21 (3d Cir. 2000)
- Chandler v. Commissioner of Social Security, 667 F.3d 356, 359, 361-62 (3d Cir. 2011)
- Rutherford v. Barnhart, 399 F.3d 546, 554 (3d Cir. 2005)
- Zirnsak v. Colvin, 777 F.3d 607, 615 (3d Cir. 2014)
- Cosme v. Commissioner of Social Security, 845 F. App'x 128, 134 (3d Cir. 2021)
- Hess v. Commissioner of Social Security, 931 F.3d 198, 210-11, 214 (3d Cir. 2019)
- Chrupcala v. Heckler, 829 F.2d 1269, 1276 (3d Cir. 1987)

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